



Proposal

1. A description of the project for which you and/or organization seeks funding.

Abstract:

The network of donors directed by Charles Koch leverages universities for private gain by following an "integrated strategy" that couples free-market academic programs with their constellation of think tanks and political groups for the "implementation of policy change." These programs have been present in some form at over four hundred colleges and universities in the United States, and their growth has been exponential since 2005. Our research shows that Koch's success has been largely reliant on violating the principles of academic freedom and shared governance.

We consider the Charles Koch Foundation an excellent case study for how any private donor can manipulate universities to make the academy work for them, not the public good. Universities face unprecedented challenges regarding institutional conflicts of interest that require the implementation of principles, standards, and policies that ensure transparency, shared faculty governance, and practices that are consistently applied across campus. Through this project, we will finalize a report detailing our recommendations for an institutional conflict of interest policy that will assist faculty in amending existing policies or adopting new policies that require university financial relationships to be (1) appropriate within the mission of the University as an institution for the common good, (2) open to the public for review, and (3) in accordance with the principles and recommendations of the American Association of University Professors. We will also get this report into the hands of 200 campus leaders by the end of March, and provide each campus with the resources necessary to successfully advocate both internally and externally for the adoption of policies that reflect these recommendations at their respective institutions.

Introduction:

Billionaire industrialists Charles and David Koch have become well known in America, not for their \$115-billion-per-year business, but because they coordinate a donor network of the nation's wealthiest free-market fundamentalists to spend hundreds of millions of dollars each election cycle, helping seat legislators and enact self-interested policy at the state and national levels. But, by Koch's own admission, his ability to truly exert long-term political influence does not depend on individual election outcomes; rather, the most crucial thread in his web of influence is at the university level. Koch has spent over \$200 million on programs at nearly 450 schools since 2005, while coordinating \$100 million from other donors.

Faculty at universities across the country are already raising concerns about the Charles Koch Foundation's relationship with their respective institutions. Awareness of CKF's insidious history of using

its “philanthropy” to buy influence over hiring, research, and curriculum at the university level is growing. Faculty are using this timely conversation as a way to agitate on campus, educate their peers on the principles of academic freedom and faculty governance, and grow their respective AAUP chapters. However, there is an urgent need to ensure these faculty have access to the necessary resources and support to turn the academic principles they value into actionable policy solutions. We believe this report will provide campuses with a guideline for how those principles might be turned into policy proposals. We intentionally kept our suggestions broad enough to allow faculty to draft specific policy language that meets the unique needs of their campuses while maintaining the original intent of the recommendations.

Methodology:

Given our capacity limitations, as well as the rapid spread of Koch giving to colleges across the country, we’re developing a report detailing our policy recommendations that, if implemented, would successfully prevent private donors from being able to buy undue academic influence. These policy recommendations are designed to hold university administrators to the following standards: (1) transparency of donor agreements, (2) unbiased faculty review of said agreements prior to their authorization, and (3) independent faculty oversight over the creation of new centers or programs with curricular impact.

In August, staff at UnKoch My Campus (UKMC) released the first draft of our university policy report and solicited feedback from over 150 faculty members at AAUP’s Summer Institute. Some of these faculty were thinking about donor influence for the first time, while others were already actively engaged in efforts to reform donor policies on their respective campuses. UKMC incorporated this feedback and released the second draft of this policy (see attached) in early January 2018. This version has been shared with our active faculty leaders for further feedback, and it is already being utilized by several faculty senate committees that are exploring policy development opportunities.

This policy report, attached, is still a working concept and we expect it to evolve over the next month. We have had several staff members at AAUP review the report and provide feedback, and we are currently in the process of incorporating that feedback into the policy recommendations themselves. We are also in the process of soliciting feedback from policy experts at the American Federation of Teachers, the National Education Association, the Service Employees International Union, and several key scholars who have backgrounds in university policy development and are knowledgeable about institutional conflicts of interest. Furthermore, we are collecting requests from our active faculty leaders on other components they would like to see outlined in the final report (as noted in our working concept as *forthcoming*). Once we finish having these allies review our policy and send us their feedback, we will edit the attached concept to reflect their expert advice. We hope to have these edits finished and the policy in final-form by March 2nd.

Before releasing the report to the public, we will host a webinar for our allies (supporters within our network of academic associations, unions, and nonprofits) to explain the content of the final product and discuss the ways in which we hope faculty, campus stakeholders, and other community supporters will be able to engage with it once it is publicly released. We will then develop a release-plan with those allies so that we can achieve our goal of getting the report to faculty on at least 200 campuses by the end of March. Before the release-date, the report will be turned into a PDF and uploaded onto our website. The website platform will also have easily-accessible links to our research and other online resources that will be useful for faculty pursuing the adoption of these policy recommendations

We will also have a press release written so that we can pitch the report to media outlets, including *Inside Higher Education*, *The Chronicle of Higher Education*, *Washington Post*, and the *Associated Press*. We will engage online by sharing the resource via our email listserv and on our social media accounts, and we will ask our allies to do the same.

Implementation and Outcomes:

With the support of allied organizations, we will distribute the report to leaders at 200 campuses by the end of March. By the close of 2018, we hope to see that 50 faculty senate bodies will have initiated formal university policy reviews, 25 of them will move that their recommendations be taken to a vote, and at least 10 will successfully implement policies that are in line with our recommendations.

We plan to achieve these goals by providing ongoing research to support faculty; connecting faculty with appropriate media outlets; offering online and on-site trainings for engaging with fellow faculty, other campus supporters, and their administrations; coordinating internal resource and strategy sharing between campuses; and facilitating external communications through the creation of social media content, email updates, and online action opportunities. We will support ongoing faculty action through the utilization of rapid-response resources, including engagement tools that allow for sending one-click emails, faxes, tweets, and phone calls to campus targets. We will also host monthly webinars to connect faculty to one another so they can share experiences and troubleshoot challenges across campuses.

Furthermore, significant attention will be given to achieving these policy solutions at George Mason University (home of the Mercatus Center and the Institute for Humane Studies, Koch's leading anti-regulatory think tank and "talent pipeline" hub, respectively). With the support of local and national allies, we will engage over 5,000 university stakeholders in support of our faculty leaders as they work to whip the votes for university policy changes this spring. We expect to engage 10,000 others nationally (with help from local, state, and national allied organizations) to demand decision-making power be placed in the hands of faculty, not corporate donors. Since GMU is Koch's most important campus, the adoption of such safeguards at Mason could substantially threaten the success of the Koch network's political efforts overall. Furthermore, success at George Mason University will serve as a point of inspiration for all campuses attempting to address their Koch-funded programs, which mirror the programs at GMU.

2. A description of the need for the proposed project and a statement of how the project would further the charitable purposes of the Foundation.

This report and its dissemination will support the goals of the Glick Fund by encouraging conversations about the principles of academic freedom and by promoting the institutionalization of the faculty's role in shared governance when it comes to the acceptance of private funds for their institutions.

Over the past two years, we've seen many of our current faculty leaders be successful in organizing their colleagues around the issue of donor influence at their institutions. First, by merely citing our research on the ways in which the Charles Koch Foundation has been violating principles of academic freedom and shared governance through its donations to universities, faculty are starting conversations about these core principles amongst their peers and administrators, many of whom were otherwise unfamiliar with the AAUP. Some of our campuses have even started or revamped their AAUP chapters as a response to

these concerns. These efforts alone are empowering faculty with a better understanding of academic freedom and are encouraging the development of long-term infrastructures that can continue to promote the cause of academic freedom outside of the fight against donor influence. Along with the dissemination of our report, we will be providing hundreds of campuses with access to the very research that led to these promising developments on the campuses we are already supporting.

Furthermore, this project directly furthers the cause for academic freedom by institutionalizing the faculty's role in determining what financial agreements their institutions may enter with private donors. At the institutions we have worked with thus far, university administrators and fundraising professionals are signing major donor agreements that include the alteration of curriculum, hiring of faculty, and the creation of entirely new programs, centers, and institutes without consulting their faculty. Our project advocates for a faculty oversight committee to be adopted on campuses across the country that will hold the university accountable to including faculty in the determination of which funds are accepted on their campuses, and what terms and conditions are allowed to come with those funds. Not only will this increase the faculty's role in shared governance surrounding fundraising, but it will also serve as a means by which faculty can preserve their roles in setting curriculum, hiring their peers, and establishing new programs.

Many of the faculty we work with reach out to us in urgent need for support, as they often only learn about new Koch funding after an agreement has been made or only days before a new center is announced. Faculty leaders need resources, they need them fast, and they are often so overworked that the idea of writing new policy proposals from scratch seems daunting. The finalization and dissemination of this report will serve as an accessible resource that can help faculty across the country advocate for the cause of academic freedom and preserve their rightful role in shared governance in a more timely manner, and in a way that best suits their specific campuses and needs.

We are confident that this project will also serve as a cross-campus educational opportunity that will facilitate collaboration, skill-sharing, and research-sharing amongst faculty nationally. For example, we hosted a faculty webinar in January that brought together representatives from 7 campuses who have already been utilizing the draft of this policy. After the webinar, those faculty joined a Google Group where they have shared resources and sought ongoing advice from one another.

Finally, we consider the advocacy efforts that will result from the release of this report as an opportunity to increase media attention around the current threats to academia, meaning these efforts will not only further the cause for academic freedom amongst academics, but increase the awareness of these concepts within the general public. By furthering conversations about AAUP principles and streamlining access to resources that are necessary for a timely response to the growing threats posed by private donors, we hope this project will ultimately launch a national movement, on and off campus, to preserve the principles of academic freedom and further the cause for shared governance across the country.

WORKING CONCEPT

**INSTITUTIONAL CONFLICTS OF INTEREST:
RECOMMENDATIONS FOR IMPROVING CAMPUS
GIFT ACCEPTANCE POLICIES**

A Report by UnKoch My Campus
February 9, 2018

GENERAL OBSERVATIONS

Billionaire industrialists Charles and David Koch have become well known in America, but not for their \$115-billion-per-year business. The Kochs coordinate a network of the nation's wealthiest free-market fundamentalists to spend hundreds of millions of dollars each election cycle. This has helped the Koch donor network seat legislators and enact self-interested policy at the state and national levels.¹

While there has been growing attention to the Koch network's funding of think-tanks like the Heritage Foundation and CATO Institute, astroturf organizations like Americans for Prosperity, and large campaign contributions to politicians, less consideration has been given to their donations to colleges and universities. The Charles Koch Foundation itself has spent over \$200 million on programs at nearly 450 institutions of higher education since 2005, while coordinating \$100 million from other donors.² By Koch's own admission, these university investments are the most crucial components to his ability to exert long-term political influence.³

These university investments reflect Charles Koch's political theory of change, which he calls the "Structure of Social Change." In this plan, Koch begins by establishing university centers and funding professorships that are required to explore the ways in which free markets *benefit* society. The ideas formulated through these campus programs are transformed into policy proposals at Koch-funded think tanks. Those proposals are then championed by Koch's front-groups, such as Americans for Prosperity, and used to lobby elected officials to implement the policy changes Koch wishes to see. Oftentimes these same elected officials are also directly funded by Koch Industries.⁴

Leaked recordings of Koch officials speaking at a June, 2014 panel entitled "Leveraging Science and Universities" reinforced suspicions that Koch's academic programs were in fact, in the words of longtime Koch Industries executive Kevin Gentry, being used for "building state-based capabilities and election capabilities." Gentry described how the Koch Foundation uses universities as recruiting grounds to rope students into its "talent pipeline" in order to encourage students to become the "major staffing" at Koch's network of think tanks and political front groups across the country. In Gentry's words, the Koch network's "fully integrated" academic and political investments would "not just change the policies of those states, but also have a significant impact on the federal government."⁵

In 2011, research released by faculty and students at Florida State University provided the first critical insight into how the Charles Koch Foundation utilizes its contributions to universities to ensure the goals described above are achieved. A multi-million dollar gift from the Charles Koch Foundation in 2008 came with the stipulation that a Koch-appointed advisory board would give the Koch Foundation veto power over faculty hiring. The "gift" was also conditional on the selection of the department chair, and granted direct influence over curricular and extracurricular programming, graduate fellowships, post-doctoral programming, and the creation of a certificate program.⁶

¹ Mayer, J. (2016). *Dark money: The hidden history of the billionaires behind the rise of the radical right*. New York, NY: Anchor Books.

² [Charles Koch University Funding Database](#)

³ [Anti-Capitalism and Business](#), speech by Charles Koch

⁴ [The Structure of Social Change](#) by Richard Fink

⁵ [Leveraging Science and Universities](#), transcription, 2014

⁶ [Center for Public Integrity, Koch foundation to college: Teach our curriculum, get millions](#)

PURPOSE & SCOPE

Early conceptions of higher education emphasized the university's role in advancing knowledge and educating students to preserve civic and democratic values.⁷ Acknowledging this original intent to prepare our citizenry to thoughtfully participate in the public sphere, it is easy to understand why academia is often called the last bastion of our democracy. We at UnKoch My Campus believe that the Charles Koch Foundation's philanthropy offers a unique case study on how private donors, particularly those that seek to manipulate academia to serve their private interests, pose a threat to the academy's original purpose.

Colleges and universities exist to serve the common good, and the preservation of this mission, according to the American Association of University Professors (AAUP), requires that the academy remain independent from outside influence.⁸ The AAUP was founded in 1915 to help "shape American higher education by developing the standards and procedures that maintain quality in education and academic freedom in this country's colleges and universities." One of their core contributions has been their recommendation that universities prioritize the pursuit of the common good over the interests of its trustees, benefactors, donors, individual faculty, and the institution as a whole.⁹

Since 1915, higher education has grown exponentially. To keep pace with this expansion, universities have become more and more reliant upon private philanthropy. While these private donations have allowed universities to build new classrooms, offer new programs, and grow their research capacity, they have also introduced new threats to the principled independence of these institutions. Gifts stipulating that a donor's corporate agenda be advanced and legitimized through our nation's university research and education, such as those provided by the Charles Koch Foundation, have the power to debase the integrity of our education system as a whole. While the Koch network currently appears to have the most expansive infrastructure and well-documented intentions for influencing academia in this way, we fear that universities are at risk of having their mission to serve the common good further corrupted.

Faculty at universities across the country are using the Charles Koch Foundation's relationship with their institutions to advocate for the preservation of their university's independence. There is an urgent need to ensure these faculty have access to the necessary resources and support to turn the academic principles they value into actionable policy solutions.

We compiled this report to provide colleges and universities with an outline for how those principles might be turned into policy proposals. We intentionally kept our suggestions broad enough to allow faculty to draft language that meets the unique needs of their campuses while maintaining the original intent of the recommendations. We hope this report will serve as an advocacy tool for campuses that already have Koch funding and a reference for anyone who is eager to prevent *any* donor from buying control over the production of knowledge.

- The UnKoch Team

⁷ Kezar, A. (2005). *Higher Education for the Public Good: Emerging Voices from the National Movement*. San Francisco, CA: John Wiley & Sons, Inc.

⁸ 1940 Statement of Principles on Academic Freedom and Tenure

⁹ Tiede, H. (2015). *University reform: The founding of the American Association of University Professors*. Baltimore, MD: Johns Hopkins University Press.

INTRODUCTION

Universities face unprecedented challenges regarding institutional conflicts of interest that require the updating and implementation of principles, standards, and policies that ensure transparency, faculty shared governance, and practices that are consistently applied across campus.

According to the American Association of University Professors (2014), “an institutional COI occurs when the financial interests of an institution or institutional officials, acting within their authority on behalf of the institution, may affect or appear to affect the research, education, clinical care, business transactions, or other governing activities of the institution” (p. 24).¹⁰

As a principle, the university must preserve the primacy of shared faculty governance “in establishing campus-wide policies for planning, developing, implementing, monitoring, and assessing all donor agreements and collaborations, whether with private industry, government, or nonprofit groups. Faculty, not outside sponsors, should retain majority control over the campus management of such agreements and collaborations” (p. 16).¹⁰

Further, the university must “preserve its academic autonomy—including the academic freedom rights of faculty, students, postdoctoral fellows, and academic professionals—in all its relationships with industry and other funding sources by maintaining majority academic control over joint academy-industry committees and exclusive academic control over core academic functions (such as faculty research evaluations, faculty hiring and promotion decisions, classroom teaching, curriculum development, and course content)” (p.16).¹⁰

The adoption of an Institutional Conflict of Interest (ICOI) policy is essential and must be applied and upheld consistently across the institution including affiliated schools, institutes, centers, and other facilities. ICOI policy must also apply to faculty, students, administrators, and academic professionals.

With this understanding, it is the expectation of any entity raising money for or on behalf of the University to comply with an ICOI policy, even if this policy expects greater transparency than required by the law or other standard fundraising practices. It is also the expectation of all responsible parties, including but not limited to: the faculty, the Office of Advancement, the university administration, and prospective donors, to respect the faculty's authority to best enforce the principles of academic freedom and shared governance when dealing with funding from outside sponsors.

To avoid Institutional Conflicts of Interest, we suggest universities amend existing policies or adopt new policies that ensure financial relationships are:

- appropriate the the mission of the University as an institution for the common good;
- open to the public for review;
- in accordance with the principles and recommendations of the American Association of University Professors

¹⁰ American Association of University Professors (2014). *Recommended principles to guide academy-industry relationships*. Champaign, IL: University of Illinois Press.

SUMMARY OF RECOMMENDATIONS

To ensure that the University avoids Institutional Conflicts of Interest and preserves the faculty's authority to best enforce the principles of academic freedom and shared governance when dealing with funding from outside sponsors, we recommend the University:

1. Amend or adopt a Gift Acceptance Policy that:
 - a. prioritizes transparency of donor relationships;
 - b. situates decision-making authority for the acceptance of restricted gifts in the hands of faculty; and
 - c. ensures that a gift will NOT be accepted if it violates academic freedom, faculty governance, or threatens the mission of the university as an institution for the common good.

For a more detailed outline of our recommended components of a Gift Acceptance Policy, *see pages 5-6*. For an example of what a Gift Acceptance Policy that incorporates these themes might look like, *see pages 9-13*.

2. Amend or adopt a Centers and Institutes Policy that:
 - a. situates decision-making authority for the creation of a new Center or Institute in the hands of faculty;
 - b. situates decision-making authority for the continuation of a new, or existing, Center or Institute in the hands of faculty;
 - c. ensures donors do not have influence over the governance structure of Centers and Institutes to which they donate;
 - d. ensures that a Center or Institute's activities will not be allowed to violate academic freedom, faculty governance, or threaten the mission of the university as an institution for the common good.

For a more detailed outline of our recommended components of a Centers and Institutes Policy, *see page 7*. For an example of what a Centers and Institutes Policy that incorporates these themes might look like, *see pages 14-19*.

3. Create a standing Institutional Conflict of Interest Committee that is responsible for ongoing oversight and consideration of new challenges posed by the financial relationships required to operate the University. For a more detailed outline of our recommended composition and mission of a standing Institutional Conflict of Interest Committee, *see page 8*.

A list of Frequently Asked Questions can be found on *page 20*. We hope this will help expand upon points made throughout this proposal.

HELPFUL DEFINITIONS

Gift: a voluntary, irrevocable transfer of money, real property, or tangible or intangible personal property, including securities, for philanthropic purposes, without the expectation of payment, services, goods or other consideration given in return.¹¹

Restricted Gift: any gift, philanthropic grant, or pledge that does not go to the general fund or University Endowment.¹²

Center: a center is an organized unit of a single college of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service.¹³

Institute: an institute is an organized unit staffed, supported, and governed by several colleges of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service to enhance by collaboration the University's strength in specific areas.¹³

Consortium: a consortium is an organized unit of the University formed by several campuses, institutes, and/or centers whose mission is to coordinate the efforts of its individual components and in which no single component leads.¹³

Special Initiative: a special initiative is used to define an occasion when the University has a special opportunity or is specially invited to serve the city, state, or nation in projects that do not fall within the category of a center, institute, or consortium.¹³

Programming: programming includes curriculum, textbooks, certificates, minors, majors, centers, institutes, consortia, and special initiatives.

¹¹ Western Carolina, Policy 104

¹² GMU, Expanded Gift Acceptance Policy (draft)

¹³ CUNY, Policy 1.09

Principles for Guiding Gift Acceptance: Detailed Recommendations

All restricted gift agreements with private donors must be made accessible to the public.

- We recommend making your Office of Advancement, or related institutional entity, responsible for the creation and maintenance of an online archive that houses all approved and recorded donor agreements and related documents that are attached to a restricted gift, pledge, or philanthropic grant. This database will be made accessible to the general public.

Decision-making authority for accepting restricted gifts must rest with the faculty.

- We recommend a Gift Acceptance Committee be responsible for reviewing all gifts, pledges, and philanthropic grants to the university. This committee should have the authority to approve all non-restricted gifts. The Committee should be responsible for sending any gifts that fall under the definition of “restricted gift” to a faculty-majority committee for further review.
 - We recommend:
 - there be a mixture of both administrators and faculty on this committee;
 - the faculty members on the committee be elected by the Faculty Senate
- We recommend the creation of a standing faculty-majority committee that will be responsible for vetting and approving all restricted gifts.
 - We recommend:
 - there be a minimum of five faculty on this committee;
 - that the faculty on this committee be tenured faculty representing at least five different departments/schools within your university;
 - that these faculty be appointed through the Faculty Senate by a majority vote;
 - that these faculty undergo training on AAUP principles before serving on this committee ¹²
- We recommend that a gift designated to support the creation of a new center, institute, consortia, or special initiative only be accepted if it is authorized by the full Faculty Senate. For guidance on this proposed authorization process, see “Guiding Principles for Centers and Institutes” on page 6.

Restricted gifts must be appropriate to the mission of the University as an institution for the common good and must be in accordance with the principles and recommendations of the American Association of University Professors.

- We recommend that gift agreements with donors who might have a financial interest in the outcome of the scholarly activities they propose to fund be subject to scrutiny similar the processes faculty are subjected to. Like faculty COI review, such potentially conflicted donor relationships should be halted for review.

- We recommend gifts be vetoed if they are contingent upon the donor's ability to:
 - maintain control over the dispersal of funds;
 - retain the ability to withdraw funding after the agreement is signed;
 - require the creation of student clubs or specific student programming;
 - screen student recipients of funding;
 - access student information, including email addresses;
 - suggest or reject visiting speakers or speaker topics;
 - control or influence the publicity of their donation;
 - control or influence the publicity of the program they are donating to;
 - influence the creation or staffing of an advisory board;
 - influence or veto the hiring of faculty;
 - influence or veto the retention of faculty;
 - draft or approve job descriptions;
 - influence or veto the content of the curriculum;
 - influence, approve or reject dissertation topics;
 - influence, approve or reject reading lists, textbooks, or other educational materials used inside of classrooms or by student organizations;
 - review research before publication;
- We recommend gifts to support specific programming be vetoed for any of the above reasons and if the designated programming:
 - duplicates or substantially competes with current departments, schools, colleges, other centers, institutes, consortia, or special initiatives; ¹³
 - does not align with the university's mission, vision, or goals;
 - is not first approved by normal faculty governance processes

Principles for Guiding Centers and Institutes: Detailed Recommendations

New centers, institutes, consortia, and special initiatives must undergo planning, establishment, and management periods.

- See attached example on pages 12-17.

Requests to plan a new center, institute, consortium, or special initiative must be approved by the full Faculty Senate.

- We recommend that a gift agreement that is restricted to support a specific center, institute, consortia, or special initiative NOT be approved until after the Faculty Senate authorizes the planning period for it.
- See attached example on pages 12-17.

The governance structure of centers, institutes, consortia, and special initiatives must be authorized by the faculty.

- We recommend a faculty-majority oversight committee exist at each University that has the authority to approve the governance structure of new centers, institutes, consortia, and special initiatives.
 - We recommend the oversight committee include at least: (1) a member of the Faculty Senate who is appointed by majority vote by the full Faculty Senate; (2) a tenured faculty member from each academic college or school who is appointed by their dean
- See attached example on pages 12-17.

All centers institutes, consortia, and special initiatives must be approved for continuation by the faculty one year after its creation and at least every five years following.

- We recommend the same oversight committee established to approve the establishment and oversee the management of new centers, institutes, consortia, and special initiatives be responsible for the audit of existing centers.
- See attached example on pages 12-17.

All centers, institutes, consortia, and special initiatives that exist before the adoption of this policy must be approved for continuation by the faculty within five years of the adoption of this policy.

- We recommend the same oversight committee established to approve the establishment and oversee the management of new centers, institutes, consortia, and special initiatives be responsible for the audit of existing centers.
- See attached example on pages 12-17.

Institutional Conflicts of Interest Committee: Detailed Recommendations

FORTHCOMING

GIFT ACCEPTANCE POLICY: EXAMPLE

I. Policy Statement

[Insert University] and its associated Support Organizations and bodies, including [insert support organizations, such as a university foundation], acknowledge that recent shifts in higher education funding generally have resulted in increased focus and reliance on charitable gifts and donations. The University and its Support Organizations also acknowledge that reliance on private philanthropy requires the University to strike the appropriate balance between institutional fiscal welfare and interests and the independence of its academic programs. Accordingly, it is the policy of the University to provide faculty with the decision-making authority for accepting restricted gifts to ensure the maintenance of institutional autonomy and the protection of academic freedom and faculty governance.

II. Scope

This policy applies to all restricted gifts given to the University or its Support Organizations. We define a restricted gift as any gift, philanthropic grant, or pledge that does not go to the general fund of University Endowment.

This policy does not apply to grants that are designated for research and will undergo standard IRB approval.

III. Definitions

Restricted Gift: any gift, philanthropic grant, or pledge that does not go to the general fund of University Endowment

Center: a center is an organized unit of a single college of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service

Institute: an institute is an organized unit staffed, supported, and governed by several colleges of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service to enhance by collaboration the University's strength in specific areas

Consortium: a consortium is an organized unit of the University formed by several campuses, institutes, and/or centers whose mission is to coordinate the efforts of its individual components and in which no single component leads

Special Initiative: a special initiative is used to define an occasion when the University has a special opportunity or is specially invited to serve the city, state, or nation in projects that do not fall within the category of a center, institute, or consortium

Programming: programming includes curriculum, certificates, minors, majors, centers, institutes, consortia, and special initiatives.

IV. Roles

University Foundation: The Foundation was established to assist the university in generating private support and to manage, invest, and administer private gifts, including endowment and real property. The Foundation has full authority to accept unrestricted gifts that go to the general fund of University Endowment pending approval by the Gift Acceptance Committee. Foundation staff are only authorized to accept restricted gifts after they follow the processes outlined in this policy and related policies.

Office of Advancement: The Office of Advancement is responsible for (1) supporting the Foundation and University in the solicitation of gifts; (2) the creation and maintenance of an online database that houses all approved and recorded gift agreements and related documentation that are attached to a restricted gift, pledge, or philanthropic grant. The Office of Advancement must make this database public and available for review. Copies of gift agreements and related documentation should be uploaded within 30 days of formal approval.

Gift Acceptance Committee (GAC): The Gift Acceptance Committee is responsible for reviewing all gifts, pledges, and philanthropic grants to the university. This Committee has the authority to approve all non-restricted gifts and is responsible for informing the Foundation of their ability to accept non-restricted gifts. The Committee is responsible for sending any gifts that fall under the definition of "restricted gift" to a faculty-majority committee for further review.

The Gift Acceptance Committee shall include:

- the President of the Foundation;
- the University Provost;
- the Senior Vice President for Administration and Finance of the University;
- the Controller of the University;
- the Chief Financial Officer of the Foundation;
- the Associate Vice President of University Advancement and Alumni Relations of the University;
- the Associate Vice President of Advancement and Executive Campaign Director of the University;
- one of the Deans currently serving as a representative on the Foundation's Board of Trustees;
- two faculty members elected by the Faculty Senate ¹²

Faculty Oversight Committee on Outside Sponsorships (FOCOS): This faculty-majority committee is hereby established as a standing University committee. FOCOS shall be comprised of ex-officio and elected members. The chair of the Faculty Senate shall

serve ex-officio with vote, and shall be the chair of the Committee. The provost shall also be a member of the Committee, serving ex-officio without vote. Ex-officio members shall serve on the Committee as long as they occupy their institutional office. The Committee shall also include one tenured faculty member elected from each of university's schools or colleges. The committee members will be appointed by the full Faculty Senate through a majority vote.¹²

The Committee shall have the following duties and responsibilities: (1) review gift proposals that are subject to this policy and give authorizations to the Foundation; (2) ensure proper approval procedures of all gifts related to the creation of new programming are followed before gift acceptance; (3) consult with the president of the foundation, the senior vice president for administration and finance of the university, the controller of the university, the chief financial officer of the foundation, the associate vice president of university advancement and alumni relations of the university, the associate vice president of advancement and executive campaign director of the university, and the university's legal counsel when necessary; (4) create a standard gift agreement to be used by support organizations for the solicitation of gifts; (5) review and authorize proposed revisions to the standard agreement; and (6) review and authorize, in consultation with the University's legal counsel, proposed revisions to this policy.

Role of the Faculty Senate: The Faculty Senate must authorize all plans for the creation of new centers, institutes, consortia, or special initiatives before the Gift Acceptance Committee can approve a gift that is designated to support the creation of a new center, institute, consortium, or special initiative.

V. Responsibilities

All university personnel named in this policy must undergo training on AAUP principles before fulfilling their duties related to this policy. This includes:

- members of the Gift Review Committee;
- members of University Advancement who are directly engaged in gift solicitation;
- the president of the University;
- the president of the University Foundation;
- the senior vice president for administration and finance of the university;
- the controller of the university;
- the chief financial officer of the foundation;
- the associate vice president of university advancement and alumni relations of the university;
- the associate vice president of advancement and executive campaign director of the university;
- members of university's legal counsel who are consulted on matters of gift acceptance

VI. Review of Gift Agreements

The Faculty Oversight Committee on Outside Sponsorships must veto any gift that is contingent upon the donor's ability to:

- maintain control over the dispersal of funds;
- retain the ability to withdraw funding after the agreement is signed;
- require the creation of student clubs or specific student programming;
- screen student recipients of funding;
- access student information, including email addresses;
- suggest or reject visiting speakers or speaker topics;
- control or influence the publicity of their donation;
- control or influence the publicity of the program they are donating to;
- influence the creation or staffing of an advisory board;
- influence or veto the hiring of faculty;
- influence or veto the retention of faculty;
- draft or approve job descriptions;
- influence or veto the content of the curriculum;
- influence, approve or reject dissertation topics;
- influence, approve or reject reading lists, textbooks, or other educational materials used inside of classrooms or by student organizations;
- review research before publication;

The Faculty Oversight Committee on Outside Sponsorships must veto any gift earmarked to support specific programming for any of the above reasons and if the designated programming:

- duplicates or substantially competes with current departments, schools, colleges, other centers, institutes, consortia, or special initiatives;
- does not align with the university's mission, vision, or goals;
- is not first approved by normal faculty governance processes

If a gift is designated to support the creation of a new center, institute, consortium, or special initiative, the Faculty Senate must authorize the plan for that center, institute, consortia, or special initiative before the Faculty Oversight Committee on Outside Sponsorships can accept the gift. Gifts designated to support the creation of a new center, institute, consortia, or special initiative must meet all of the above criteria.

For guidance on the Faculty Senate authorization process for a new center, institute, consortium, or special initiative, see "Center and Institutes Rubric."

VII. Transparency

All restricted gift agreements with private donors must be made accessible to the public. The Office of Advancement is responsible for the creation and maintenance of an online database that houses all approved and recorded gift agreements and related documentation that are attached to a restricted gift, pledge, or grant. ¹² This database

must be made public and available for review. Copies of gift agreements and related documentation will be uploaded within 30 days of the Gift Acceptance Committee's approval of the gift.

CENTERS AND INSTITUTES POLICY: EXAMPLE

I. Policy Statement

As in most institutions of higher education, the normal locus for instruction and research is the academic department. Additional instruction is delivered through the University's continuing education programs. At the same time, the University benefits greatly from the activities of centers, institutes, consortia, and special initiatives. These play an important role in the University's endeavors by meeting needs that fall outside the customary domains of academic departments. Since these organized research, instruction, and training initiatives do not operate under the established rules and regulations that govern departments, it is desirable and even necessary to set policies to provide for their orderly administration.¹³

Centers, institutes, consortia, and special initiatives, should supplement, not supplant, activities of academic and administrative departments. Consequently, these entities are prohibited from duplicating functions of, or exercising routine prerogatives of, academic and administrative departments. In particular, they are not to be viewed as alternate routes to faculty appointment. Specifically, they are explicitly debarred from:

- offering regular courses;
- conferring degrees;
- appointing faculty members through their agency alone, or without adequate faculty consultation;
- conferring tenure or providing certificates of continuous employment;
- acquiring capital equipment not inventoried to an academic or administrative department;
- negotiating legal contracts on their own authority¹³

To ensure all centers, institutes, consortia, and special initiatives appropriately meet the needs of the university and are provided proper oversight, they must all undergo planning, establishment, and management periods.¹⁴

- Planning period -- demonstration of the validity of the concept, defining partner relationships and roles, and/or identifying fiscal and other resources required for sustainability¹⁴
- Establishment period -- demonstration of the concept's viability¹⁴
- Management period -- evaluation of the program's ongoing alignment with departmental, college and/or institutional missions and resources, success in accomplishing stated objectives, and sound fiscal status and practices.¹⁴

II. Scope

¹⁴ Western Carolina, Policy 105

This policy applies to the establishment of all new centers, institutes, consortia, and special initiatives, as well as the management of existing centers, institutes, consortia, and special initiatives.

III. Definitions

Restricted Gift: any gift, philanthropic grant, or pledge that does not go to the general fund of University Endowment

Programming: programming includes curriculum, certificates, minors, majors, centers, institutes, consortia, and special initiatives

Center: a center is an organized unit of a single college of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service

Institute: an institute is an organized unit staffed, supported, and governed by several colleges of the University whose mission is to sponsor, coordinate, and promote research, training, instruction, or service to enhance by collaboration the University's strength in specific areas

Consortium: a consortium is an organized unit of the University formed by several campuses, institutes, and/or centers whose mission is to coordinate the efforts of its individual components and in which no single component leads

Special Initiative: a special initiative is used to define an occasion when the University has a special opportunity or is specially invited to serve the city, state, or nation in projects that do not fall within the category of a center, institute, or consortium

IV. Roles and Responsibilities:

Faculty Oversight Committee on Outside Sponsorships: the Faculty Oversight Committee on Outside Sponsorships is responsible for ensuring the Faculty Senate has authorized the planning of all new centers, institutes, consortia, and special initiatives before approving any gift related to the creation of said centers, institutes, consortia, and special initiatives.

Faculty Senate: the Faculty Senate is responsible for authorizing the planning of all new centers, institutes, consortia, and special initiatives. Requests shall be accepted for review once an academic year, and must be submitted no later than [insert date] each year.

Oversight Committee on Centers and Institutes: the Oversight Committee on Centers and Institutes is responsible for (1) authorizing requests to establish all new centers, institutes, consortia, and special initiatives; (2) approving all new centers, institutes, consortia, and special initiatives for continuation after the first year in operation and

every five years thereafter; (3) auditing all existing centers, institutes, consortia, and special initiatives within five years of the adoption of this policy.

University Administration: the Provost and University President are responsible for submitting their own reviews of all plans, requests to establish, and comprehensive reports on all centers, institutes, consortia, and special initiatives when requested by the Faculty Senate. All other university administrators are encouraged to submit comments when requested by the Faculty Senate.

V. Planning

The planning period serves many purposes for conceptualized centers, institutes, consortia, and special initiatives, including time to demonstrate the validity of the concept, define partner relationships and roles, and/or identify fiscal and other resources required for sustainability.¹⁴

To ensure the conceptualized center, institute, consortium, or special initiative is in line with the university's mission, vision, and goals, the full Faculty Senate must approve the planning period for said center, institute, consortium, or special initiative.

In consultation with his/her supervisors and other appropriate administrators, an applicant may request institutional authorization to plan the establishment of a center or institute. Requests shall be accepted for review once an academic year, and must be submitted no later than [insert date] each year.¹⁴

The applicant shall submit their written request for authorization to plan a center or institute to the faculty senate. The request must include the following information at a minimum: (1) the relevance of the proposed center, institute, consortium, or special initiative to the mission of the University; (2) the mission, vision, and objectives of the proposed center, institute, consortia, or special initiative and why the objectives cannot be achieved within existing University colleges, schools, departments, and/or programs; (3) discussion of differentiation from similar centers, institutes, or units at the University, and proposed relationships with them; (4) the potential sources and estimates of funding to initiate and sustain the proposed center, institute, consortia, or special initiative, presented as a five-year projection, including the amounts of general fund support, non-general fund support, and in-kind support;¹⁴ (5) a discussion of all conversations that have already been had with potential sources of funding; (6) a discussion of the proposed governance of the center, institute, consortia, or special initiative; (7) a discussion of the steps the applicant has taken to consult members of the department(s), college(s), or other entities the new center, institute, consortium, or special initiative will be related to; (8) a statement on the way the idea for the proposed center, institute, consortium, or special initiative came to be; (9) discussion of differentiation from similar centers, institutes, or units at other universities, and proposed relationships with them;

The Faculty Senate should arrange for the distribution of the application among the general faculty for concurrent review and comment. Comments should be collected in writing for review by the Faculty Senate. The Faculty Senate should also arrange for the distribution of the application among the provost, president, and governing board and request they submit their own review and recommendations.

The Faculty Senate should provide the applicant with a written determination regarding whether the applicant is authorized to plan the center or institute within one 30 days of successful distribution of the application to the general faculty and administration.

VI. Establishment

When a center or institute approved for planning is ready and able to demonstrate its viability, a formal request for authorization to establish must be prepared. The applicant shall submit his/her written request for authorization to establish a center or institute to the Oversight Committee on Centers and Institutes no later than [insert date] each year.

The request must include the following information at a minimum: (1) the items listed in the authorization to plan documentation that note any changes since authorization for planning took place; (2) name of the proposed center, institute, consortia, or special initiative, which appropriately reflects its mission and scope; (3) identification of the proposed center, institute, consortia, or special initiative as either a research, public service, or instructional unit, in accordance with its primary mission and core activities; (4) organizational structure of the proposed center or institute, including name of a proposed director, description of the membership and function of any proposed advisory or policy boards, and proposed responsibility structure; (5) statement on the anticipated effects of the proposed unit on the instructional, research and/or public service programs of the administrative campus; and, when inter-institutional arrangements are involved, a statement on the anticipated effects of the proposed collaboration on the instructional, research and/or public service programs of all participating campuses; (6) statement on immediate financial needs, including the amount of general fund, non-general fund, and in kind support that will be required; (7) statement on immediate operating needs, such as equipment, library resources, and space needs, and five-year projections of future space needs; (8) when relevant, evidence that inter-institutional arrangements regarding leadership, governance, activities, funding, or other aspects have been reached by the cooperating chancellors or designees; (9) an accountability plan that complies with policy of the administrative campus, noting specific dates for the initial director and center reviews; ¹⁴ and (10) a statement on the hiring or appointment processes the proposed center, institute, consortia, or special initiative will follow to fill positions for its director and/or advisory or policy boards

The Oversight Committee on Centers and Institutes should arrange for the distribution of the application among the general faculty for concurrent review and comment. Comments should be collected in writing for review by the advisory committee. The

oversight committee should arrange for the distribution of the application among the provost, president and governing board and request they submit their own review and recommendations.

The Oversight Committee on Centers and Institutes should provide the applicant with a written determination regarding whether the applicant is authorized to establish the center or institute within 30 days of successful distribution of the application to the general faculty and administration.

VII. Management

Each year, the director of the active center, institute, consortium, or special initiative must submit an annual report at the end of each fiscal year to the Oversight Committee on Centers and Institutes. This review should include:

- a summary of center activities for the year ended;
- objectives and goals for the upcoming year;
- the fiscal year-end financial report; and
- the proposed budget for the upcoming year ¹⁴

After its first year in operation and every five years following, the active center, institute, consortium, or special initiative must be approved by the Oversight Committee on Centers and Institutes for continuation via a comprehensive review to evaluate ongoing alignment with departmental, college and/or institutional missions and resources, success in accomplishing stated objectives, and sound fiscal status and practices. This review should include: (1) the process for director searches, including steps of the process, participants and responsible parties, and appropriate decision-making procedures; (2) cycle(s) for annual and comprehensive reviews of center and institute activities, including designation of the responsible office or offices; (3) evaluation criteria to include at a minimum: (a) performance against specific objectives and goals; (b) quality and quantity of scholarly activity (as appropriate permission), teaching and other instructional activity (as appropriate per mission), and service (as appropriate permission); (c) sufficient budget to continue operation, including the amount and proportion of funds received from general fund and non-general fund sources as well as in kind support; (d) fiscal oversight; (e) analysis and assurance that the entity does not duplicate other institutional, UNC, or state entities; (d) analysis and consideration as to whether the entity's work can be effectively accomplished by a single department or program; and (e) stakeholder feedback (stakeholder defined as appropriate per the unit's mission); (4) Listing of other considerations, outside of the above performance review criteria, to be discussed during review periods, including facilities, personnel, or other operational needs; (5) Cycle(s) for reviews of center and institute directors, including designation of the office or offices responsible for conducting the review; (6) Criteria for director review, to include at minimum: (a) Performance against individual objectives and goals; (b) Feedback on leadership and communication from center/institute staff, partners and/or clients; (c) Management of fiscal and human resources; (d) Standard

practices and procedures for involving other UNC constituent institutions in review processes, when relevant; (e) Articulation of the type of unsatisfactory performance that could merit conditions for discontinuation of a center, institute, director, or others; and (f) Clear plans for occasions when centers, institutes or directors do not meet minimum review expectations, including process, milestones, and responsible parties. ¹⁴

VIII. Existing Centers, Institutes, Consortiums, and Special Initiatives

All existing centers, institutes, consortia, and special initiatives must be approved for continuation by the Oversight Committee on Centers and Institutes within five years of the adoption of this policy. We recommend this audit include the review of an application that includes all relevant components of the planning, establishment, and management periods listed above.

IX. Political Activity and Lobbying

University employees assigned to centers and institutes are prohibited from engaging in political activity while on duty and using the authority of one's position or University or center or institute funds, services, supplies, equipment, information technology resources, vehicles or other resources for such activities. ¹⁴

X. Discontinuation

A center or institute may be discontinued for a variety of reasons, including but not limited to lack of fiscal resources for sustainability, termination of a supporting grant or award, lack of fit with departmental, college or institutional missions or objectives, or a change in institutional priorities. ¹⁴

FREQUENTLY ASKED QUESTIONS:

ANSWERS FORTHCOMING

What is the difference between a gift and a grant?

What about donor anonymity?

Why does the Gift Acceptance process include two Committees?

Why do centers need to be approved by the faculty first?

Why is transparency emphasized?

How does this relate to faculty governance?

Could rejecting funding infringe on faculty member's academic freedom?

Should these processes include vetting donations from other sources, too?

AGREEMENT

AGREEMENT made this 1st day of December, 2017, between Essential Information, Inc., a Washington, DC nonprofit corporation located at 1530 P Street, NW Washington, DC and UnKoch My Campus ("UnKoch") an unincorporated association, located at 1530 P Street, NW Washington, DC.

WHEREAS, Essential Information is exempt from Federal income taxation under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, (the "Code") and has been classified as other than a private foundation under Code Section 509 a (1);

WHEREAS, the purposes of Essential Information include the following: providing information to the public on important topics neglected by the mass media and policymakers; publishing books and reports; sponsoring investigative journalism conferences; providing writers and citizen activists with grants to pursue investigations and various projects; and operating clearinghouses which disseminate information to grassroots organizations worldwide.

WHEREAS, the Grantee, UnKoch is an unincorporated organization designed to raise public awareness among university stakeholders, allied organizations, and the general public about Koch's undue influence on college campuses;

WHEREAS, Essential Information desires to accept UnKoch as a Program of Essential Information and to receive grants, contributions and gifts to be awarded by donors to Essential Information to further UnKoch;

NOW THEREFORE, in consideration of the mutual promises, conditions and covenants contained herein, the parties agree as follows:

1. Essential Information agrees to receive grants, contributions and gifts (the "Funds") to be used for UnKoch.
2. Essential Information will provide limited administrative support to UnKoch. UnKoch agrees that it will pay all administrative costs associated with its project and that UnKoch will be responsible for any legal expenses incurred in connection with sponsoring this project. Essential Information estimates that administrative costs associated with the UnKoch project will be under two percent of the total funds received for the UnKoch project.

3. UnKoch may solicit contributions that are earmarked for the activities of UnKoch. Essential Information shall be responsible for the processing and acknowledgement of all monies received for UnKoch.

4. UnKoch's sources of funding for grants and the text of UnKoch's grant applications are subject to approval by Essential Information. UnKoch will provide Essential Information with copies of all grant applications, recommendations regarding grant awards and other documentation required by Essential Information to enable it to fulfill its obligations as a fiscal sponsor. Essential Information's Executive Director must approve the submission of all grant applications or proposals. All grant agreements, pledges, or other commitments with funding sources to support UnKoch shall be executed by Essential Information. As with other fundraising, Essential Information shall be responsible for the processing and acknowledgement of all grant monies received for UnKoch, which shall be reported as the income of Essential Information for both tax purposes and for purposes of Essential Information's financial statements.

5. UnKoch's obligations shall include the following:

a. UnKoch agrees to use any and all funds it receives from Essential Information exclusively for charitable, scientific, literary or educational purposes consistent with Section 501(c)(3) and Section 170(c)(2)(B) of the Internal Revenue Code and at all times engage in activities and act as an organization solely described in Section 501(c)(3) of the Code.

b. UnKoch agrees that at no time will any funds it receives from Essential Information be used to influence the outcome of any specific public election, or to participate in, or intervene in (including the publishing or distributing of statements) any political campaign on behalf of (or in opposition to) any candidate for public office. Additionally, UnKoch agrees that at no time will any funds it receives from Essential Information be used for any attempt to influence the outcome of any selection, nomination, election, or appointment of any individual to any public office or office of a political organization within the meaning of Internal Revenue Code Section 527(e)(2).

c. UnKoch agrees that no funds that it receives from Essential Information will be used to carry on propaganda or otherwise to attempt to influence legislation within the meaning of Internal Revenue Code Section 4911(d) unless UnKoch receives prior written approval for any such expenditure from Essential Information.

d. UnKoch will maintain financial records adequate to demonstrate the use of all funds it receives from Essential Information and agrees to retain such records for at least four years after the conclusion of any grant period.

e. UnKoch shall submit a full and complete narrative report that describes the activities of the project associated with each grant provided to Essential Information for UnKoch's work. UnKoch shall submit these grant reports to Essential Information thirty days before Essential Information is required to provide financial and narrative reports to any funder.

6. The Funds will be under the control of Essential Information and will be distributed for UnKoch at the discretion of Essential Information. Essential Information only authorizes UnKoch to make expenditures, which do not exceed total contributions for UnKoch, on its behalf for use in the Project. UnKoch will request disbursements of Funds solely for legitimate expenses in furtherance of UnKoch's purpose.

7. UnKoch agrees to use any and all funds received from Essential Information solely for legitimate expenses of UnKoch, and to account fully to Essential Information for the disbursement of all Funds received from Essential Information during each calendar quarter within ten (10) business days after the end of such calendar quarter. In addition to a financial accounting of Funds received from Essential Information, the quarterly report from UnKoch will include a narrative description of the status and accomplishments of UnKoch.

8. Essential Information agrees that all grants, charitable contributions and gifts which it receives for UnKoch will be reported as contributions to Essential Information as required by law, and further agrees to acknowledge receipt of any such grant, contribution or gift in writing to the donor and to furnish evidence of Essential Information's status as an exempt organization under Code Section 501(c)(3) to the donor upon request. Essential Information agrees to notify UnKoch of any change in its tax-exempt status.

9. UnKoch agrees not to use funds from Essential Information in any way which would jeopardize the tax-exempt status of Essential Information. UnKoch agrees to comply with any written request by Essential Information that it cease activities which might jeopardize Essential Information's tax status or result in adverse consequences to Essential Information.

10. UnKoch agrees to use its best efforts to carry out UnKoch's purposes. UnKoch will advise Essential Information on any proposed material changes to UnKoch and will not make any changes without the prior written consent of Essential Information.

11. This agreement will remain in force until December 31, 2018 unless it is terminated with 60 days written notice by either Essential Information or UnKoch, whichever date is sooner. The foregoing notwithstanding, if Essential Information determines that its continued fiscal sponsorship of UnKoch may jeopardize Essential Information's tax-exempt status, Essential Information may terminate this Agreement immediately upon notice to UnKoch.

12. If UnKoch will continue to exist but Essential Information terminates the fiscal sponsorship of UnKoch, UnKoch may identify another nonprofit corporation that is tax-exempt under IRC Section 501(c)(3), is not classified as a private foundation under Section 509(a), and that is willing and able to sponsor UnKoch (the "Successor"). After all outstanding UnKoch liabilities have been satisfied, Essential Information will transfer the balance of funds held on behalf UnKoch to the Successor organization. Essential Information shall transfer these funds to the Successor organization as soon as administratively practicable, subject to the approval of any third parties (including funding sources) that may be required. If UnKoch has formed a new organization qualified to be a Successor, such organization shall be eligible to receive all such assets so long as such organization has received a determination letter from the Internal Revenue Service which states the new organization is exempt from federal tax under section 501(c)(3) of the Internal Revenue Code. If no Successor is found, Essential Information may allocate UnKoch's assets in any manner consistent with applicable federal and state tax laws and regulations.

13. UnKoch's publicity, news releases, programs and video tapes, and any other Project-related material circulated among the news media and the general public will only acknowledge the involvement of Essential Information as follows: "UnKoch My Campus" is a project of Essential Information" or some other acknowledgment agreed upon in writing by the parties.

14. This Agreement terminates if one or more of the following events occurs and continues:

a. Essential Information requests UnKoch to cease activities which Essential Information deems might jeopardize its tax-exempt status or which might result in

adverse tax consequences to Essential Information, and UnKoch fails to comply with such request, or

b. Either party hereto fails to perform or observe any other term, condition or covenant of this Agreement, which remains unremedied for a period of fifteen (15) calendar days after notice thereof is given to such party by the other party hereto; or

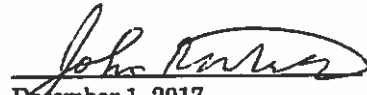
c. The parties hereto determine by mutual agreement, which is in writing and signed by each of the parties hereto, that this Agreement is terminated.

In the event this Agreement is terminated UnKoch funds will not be transferred to any individual or entity without the consent of Essential Information which will be restricted to transferring such funds solely to one or more Code Section 501(c)(3) organizations or to one or more individuals or entities as actual remuneration for services rendered to UnKoch.

15. This Agreement is governed by, and will be construed and interpreted in accordance with, the laws of the District of Columbia.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the 1st day of December, 2017.

Essential Information
By: John Richard, Director


December 1, 2017

UnKoch My Campus
By Lindsey Berger


December 1, 2017

Return of Organization Exempt From Income Tax

OMB No. 1545-0047

2016Open to Public
InspectionDepartment of the Treasury
Internal Revenue Service

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

▶ Do not enter social security numbers on this form as it may be made public.

▶ Information about Form 990 and its instructions is at www.irs.gov/form990.

A For the 2016 calendar year, or tax year beginning 01/01, 2016, and ending 12/31, 2016	
B Check if applicable:	C Name of organization Essential Information
<input type="checkbox"/> Address change	Doing business as
<input type="checkbox"/> Name change	Number and street (or P.O. box if mail is not delivered to street address) Room/suite
<input type="checkbox"/> Initial return	P O Box 19405
<input type="checkbox"/> Final return/terminated	City or town, state or province, country, and ZIP or foreign postal code
<input type="checkbox"/> Amended return	Washington, DC, 20036
<input type="checkbox"/> Application pending	F Name and address of principal officer: John Richard P O Box 19405, Washington, DC 20036
D Employer identification number 52-1299631	
E Telephone number 202-387-8030	
G Gross receipts \$ 383,857	
H(a) Is this a group return for subordinates? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
H(b) Are all subordinates included? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If "No," attach a list. (see instructions)	
H(c) Group exemption number ▶	
I Tax-exempt status: <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 501(c) () ◀ (insert no.) <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527	
J Website: ▶ www.essentialinformation.org	
K Form of organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association <input type="checkbox"/> Other ▶	
L Year of formation: 1982 M State of legal domicile: DC	

Part I Summary

Activities & Governance	1 Briefly describe the organization's mission or most significant activities: Essential Information educates the public on topics neglected by the media and policy-makers.
	2 Check this box <input type="checkbox"/> if the organization discontinued its operations or disposed of more than 25% of its net assets.
	3 Number of voting members of the governing body (Part VI, line 1a) 3 4
	4 Number of independent voting members of the governing body (Part VI, line 1b) 4 4
	5 Total number of individuals employed in calendar year 2016 (Part V, line 2a) 5 1
	6 Total number of volunteers (estimate if necessary) 6 0
	7a Total unrelated business revenue from Part VIII, column (C), line 12 7a 0
b Net unrelated business taxable income from Form 990-T, line 34 7b 0	
Revenue	8 Contributions and grants (Part VIII, line 1h) 267,250 381,750
	9 Program service revenue (Part VIII, line 2g) 137 2,049
	10 Investment income (Part VIII, column (A), lines 3, 4, and 7d) 14 58
	11 Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e) 482 0
	12 Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12) 267,883 383,857
	Expenses
14 Benefits paid to or for members (Part IX, column (A), line 4) 0 0	
15 Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10) 0 56,902	
16a Professional fundraising fees (Part IX, column (A), line 11e) 0 0	
b Total fundraising expenses (Part IX, column (D), line 25) ▶ 30	
17 Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e) 227,789 292,747	
18 Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25) 277,789 374,649	
19 Revenue less expenses. Subtract line 18 from line 12 -9,906 9,208	
Net Assets or Fund Balances	20 Total assets (Part X, line 16) 85,829 98,300
	21 Total liabilities (Part X, line 26) 2,503 4,852
	22 Net assets or fund balances. Subtract line 21 from line 20 83,326 93,448

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here	Signature of officer	Date			
	John Richard, President	10/19/17			
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input checked="" type="checkbox"/> if self-employed	PTIN
	Beverly Orr	Beverly Orr	10-19-17		P27414441
	Firm's name ▶ Beverly Orr	Firm's EIN ▶	Phone no.	202-381-2814	
	Firm's address ▶ P O Box 19367, Washington, DC 20036				

May the IRS discuss this return with the preparer shown above? (see instructions) ☒ Yes ☐ No

For Paperwork Reduction Act Notice, see the separate instructions.

Cat. No. 11282Y

Form 990 (2016)

Part III Statement of Program Service AccomplishmentsCheck if Schedule O contains a response or note to any line in this Part III ☐**1** Briefly describe the organization's mission:Essential information educates the public on topics neglected by the media and policy-makers.**2** Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No

If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No

If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.**4a** (Code:) (Expenses \$ 85,404 including grants of \$ 0) (Revenue \$ 0)HUMAN RIGHTS: The project has involved work overseas in areas of severe repression involving the collection and distribution of human rights information, encouraging peaceful political solutions to violent conflicts, and facilitating local community work on issues of poverty, security and justice. The Human Rights and Justice Project operates a free, web-based clearinghouse, updated throughout the day, on political, social and economic developments overseas that may be of interest to academic journalists, activists and the general public. Materials circulated include scholarly official and NGO studies, foreign press reports and translations of pertinent foreign-language materials. Major topics include political change, health, the environment, popular movements, and economic trends.**4b** (Code:) (Expenses \$ 270,384 including grants of \$ 25,000) (Revenue \$ 2,049)INVENTIVE INITIATIVES: Essential Information has started more than a dozen projects in recent years and is determined to keep starting more. Rather than get hung up on traditional issues categories, the Organization's only criteria is: Does it promote innovation in the public interest? With quiet determination and sophistication, project leaders identify the fulcrums of power that invariably lie in the shadows, envision new pathways of change that entrenched organizations consider too far out, and develop new strategic political strategies that, over time, profoundly alter the terms of the debate for a given issue. Essential Information projects are designed to be flexible and evolutionary as circumstances warrant. We expand successful initiatives and discontinue less successful ones. The ascent is on experimentation to develop effective new models of citizen action. In addition, this project has funded dozens of articles on critical issues -- ranging from worker exposure to deadly gases to illegal U.S. efforts to supply the repressive Guatemalan military -- that have been overlooked or neglected by the mass media.**4c** (Code:) (Expenses \$ including grants of \$) (Revenue \$)**4d** Other program services (Describe in Schedule O.)
(Expenses \$ 0 including grants of \$ 0) (Revenue \$ 0)**4e** Total program service expenses 355,788

Part IV Checklist of Required Schedules

	Yes	No
1 Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1 ✓	
2 Is the organization required to complete Schedule B, Schedule of Contributors (see instructions)?	2 ✓	
3 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	3	✓
4 Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	4 ✓	
5 Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Revenue Procedure 98-19? If "Yes," complete Schedule C, Part III	5	✓
6 Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I	6	✓
7 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7	✓
8 Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III	8	✓
9 Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV	9	✓
10 Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi-endowments? If "Yes," complete Schedule D, Part V	10	✓
11 If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X as applicable.		
a Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI	11a ✓	
b Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b	✓
c Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c	✓
d Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d	✓
e Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e	✓
f Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f	✓
12 a Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII	12a	✓
b Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	✓
13 Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13	✓
14 a Did the organization maintain an office, employees, or agents outside of the United States?	14a	✓
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV	14b	✓
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15	✓
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16	✓
17 Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I (see instructions)	17	✓
18 Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18	✓
19 Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III	19	✓

Part IV Checklist of Required Schedules (continued)

	Yes	No
20a Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H		✓
b If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?		
21 Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II	✓	
22 Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III		✓
23 Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5 about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J		✓
24a Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a		✓
b Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?		
c Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds?		
d Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?		
25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I		✓
b Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I		✓
26 Did the organization report any amount on Part X, line 5, 6, or 22 for receivables from or payables to any current or former officers, directors, trustees, key employees, highest compensated employees, or disqualified persons? If "Yes," complete Schedule L, Part II		✓
27 Did the organization provide a grant or other assistance to an officer, director, trustee, key employee, substantial contributor or employee thereof, a grant selection committee member, or to a 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part III		✓
28 Was the organization a party to a business transaction with one of the following parties (see Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
a A current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV		✓
b A family member of a current or former officer, director, trustee, or key employee? If "Yes," complete Schedule L, Part IV		✓
c An entity of which a current or former officer, director, trustee, or key employee (or a family member thereof) was an officer, director, trustee, or direct or indirect owner? If "Yes," complete Schedule L, Part IV		✓
29 Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M		✓
30 Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M		✓
31 Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I		✓
32 Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II		✓
33 Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I		✓
34 Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1		✓
35a Did the organization have a controlled entity within the meaning of section 512(b)(13)?		✓
b If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2		
36 Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2		✓
37 Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI		✓
38 Did the organization complete Schedule O and provide explanations in Schedule O for Part VI, lines 11b and 19? Note. All Form 990 filers are required to complete Schedule O.	✓	

Part V Statements Regarding Other IRS Filings and Tax ComplianceCheck if Schedule O contains a response or note to any line in this Part V ☐

		Yes	No
1a Enter the number reported in Box 3 of Form 1096. Enter -0- if not applicable	1a 12		
b Enter the number of Forms W-2G included in line 1a. Enter -0- if not applicable	1b 0		
c Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming (gambling) winnings to prize winners?	1c	✓	
2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return	2a 1		
b If at least one is reported on line 2a, did the organization file all required federal employment tax returns? Note. If the sum of lines 1a and 2a is greater than 250, you may be required to e-file (see instructions)	2b	✓	
3a Did the organization have unrelated business gross income of \$1,000 or more during the year?	3a		✓
b If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O	3b		
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a		✓
b If "Yes," enter the name of the foreign country: ► See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			
5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a		✓
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b		✓
c If "Yes" to line 5a or 5b, did the organization file Form 8886-T?	5c		
6a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions?	6a		✓
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?	6b		
7 Organizations that may receive deductible contributions under section 170(c).			
a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor?	7a		✓
b If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b		
c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282?	7c		✓
d If "Yes," indicate the number of Forms 8282 filed during the year	7d		
e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7e		✓
f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7f		✓
g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	7g		✓
h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	7h		✓
8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year?	8		
9 Sponsoring organizations maintaining donor advised funds.			
a Did the sponsoring organization make any taxable distributions under section 4966?	9a		
b Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	9b		
10 Section 501(c)(7) organizations. Enter:			
a Initiation fees and capital contributions included on Part VIII, line 12	10a		
b Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities	10b		
11 Section 501(c)(12) organizations. Enter:			
a Gross income from members or shareholders	11a		
b Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them.)	11b		
12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?	12a		
b If "Yes," enter the amount of tax-exempt interest received or accrued during the year	12b		
13 Section 501(c)(29) qualified nonprofit health insurance issuers.			
a Is the organization licensed to issue qualified health plans in more than one state? Note. See the instructions for additional information the organization must report on Schedule O.	13a		
b Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans	13b		
c Enter the amount of reserves on hand	13c		
14a Did the organization receive any payments for indoor tanning services during the tax year?	14a		✓
b If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	14b		

Part VI Governance, Management, and Disclosure For each "Yes" response to lines 2 through 7b below, and for a "No" response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions. Check if Schedule O contains a response or note to any line in this Part VI ☒

Section A. Governing Body and Management

		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.	1a	4
b	Enter the number of voting members included in line 1a, above, who are independent	1b	4
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee?	2	✓
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors, or trustees, or key employees to a management company or other person?	3	✓
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed?	4	✓
5	Did the organization become aware during the year of a significant diversion of the organization's assets?	5	✓
6	Did the organization have members or stockholders?	6	✓
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body?	7a	✓
b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body?	7b	✓
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
a	The governing body?	8a	✓
b	Each committee with authority to act on behalf of the governing body?	8b	✓
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O	9	✓

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No	
10a	Did the organization have local chapters, branches, or affiliates?	10a	✓
b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes?	10b	
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form?	11a	✓
b	Describe in Schedule O the process, if any, used by the organization to review this Form 990.		
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13	12a	✓
b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts?	12b	✓
c	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe in Schedule O how this was done	12c	✓
13	Did the organization have a written whistleblower policy?	13	✓
14	Did the organization have a written document retention and destruction policy?	14	✓
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?		
a	The organization's CEO, Executive Director, or top management official	15a	✓
b	Other officers or key employees of the organization	15b	✓
	If "Yes" to line 15a or 15b, describe the process in Schedule O (see instructions).		
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year?	16a	✓
b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements?	16b	

Section C. Disclosure

17 List the states with which a copy of this Form 990 is required to be filed ► None

18 Section 6104 requires an organization to make its Forms 1023 (or 1024 if applicable), 990, and 990-T (Section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.
☐ Own website ☐ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

19 Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

20 State the name, address, and telephone number of the person who possesses the organization's books and records: ►
 Beverly Orr, (202)387-8030

Check if Schedule O contains a response or note to any line in this Part VII ☐

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

[illegible]

1b Sub-total	0	0	0
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c Total from continuation sheets to Part VII, Section A ▶				
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d Total (add lines 1b and 1c)	0	0	0
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2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ▶ 0

3	Did the organization list any former officer, director, or trustee, key employee, or highest compensated employee on line 1a? If "Yes," complete Schedule J for such individual	Yes	No
			✓

4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? If "Yes," complete Schedule J for such individual

5	Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? If "Yes," complete Schedule J for such person	5	✓
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Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation
None		

2	Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ▶	0
---	--	---

Part VIII Statement of RevenueCheck if Schedule O contains a response or note to any line in this Part VIII ☐

				(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants and Other Similar Amounts	1a	Federated campaigns	1a 0				
	b	Membership dues	1b 0				
	c	Fundraising events	1c 0				
	d	Related organizations	1d 0				
	e	Government grants (contributions)	1e 0				
	f	All other contributions, gifts, grants, and similar amounts not included above	1f 381,750				
	g	Noncash contributions included in lines 1a-1f: \$	0				
	h	Total. Add lines 1a-1f		381,750			
Program Service Revenue	Business Code						
	2a	Program Service Fees	900099	2,049	2,049	0	0
	b						
	c						
	d						
	e						
	f	All other program service revenue .		0	0	0	0
g	Total. Add lines 2a-2f		2,049				
Other Revenue	3	Investment income (including dividends, interest, and other similar amounts)		58	0	0	58
	4	Income from investment of tax-exempt bond proceeds		0	0	0	0
	5	Royalties		0	0	0	0
	6a	Gross rents	(i) Real (ii) Personal				
	b	Less: rental expenses					
	c	Rental income or (loss)	0 0				
	d	Net rental income or (loss)					
	7a	Gross amount from sales of assets other than inventory	(i) Securities (ii) Other				
	b	Less: cost or other basis and sales expenses .					
	c	Gain or (loss)	0 0				
	d	Net gain or (loss)					
	8a	Gross income from fundraising events (not including \$ 0 of contributions reported on line 1c). See Part IV, line 18	a				
	b	Less: direct expenses	b				
	c	Net income or (loss) from fundraising events					
	9a	Gross income from gaming activities. See Part IV, line 19	a				
	b	Less: direct expenses	b				
	c	Net income or (loss) from gaming activities					
	10a	Gross sales of inventory, less returns and allowances	a				
	b	Less: cost of goods sold	b				
	c	Net income or (loss) from sales of inventory					
Miscellaneous Revenue			Business Code				
11a							
b							
c							
d	All other revenue						
e	Total. Add lines 11a-11d		0				
12	Total revenue. See instructions.		383,857	2,049	0	58	

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

Check if Schedule O contains a response or note to any line in this Part IX ☒**Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.**

	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21	25,000	25,000		
2 Grants and other assistance to domestic individuals. See Part IV, line 22	0	0		
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16	0	0		
4 Benefits paid to or for members	0	0		
5 Compensation of current officers, directors, trustees, and key employees	0	0	0	0
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B)	0	0	0	0
7 Other salaries and wages	52,708	52,708	0	0
8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)	0	0	0	0
9 Other employee benefits	0	0	0	0
10 Payroll taxes	4,194	4,194	0	0
11 Fees for services (non-employees):				
a Management	0	0	0	0
b Legal	0	0	0	0
c Accounting	1,600	0	1,600	0
d Lobbying	0	0	0	0
e Professional fundraising services. See Part IV, line 17	0			0
f Investment management fees	0	0	0	0
g Other. (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O.)	249,191	246,806	2,385	0
12 Advertising and promotion	0	0	0	0
13 Office expenses	16,080	6,924	9,126	30
14 Information technology	15,855	14,455	1,400	0
15 Royalties	0	0	0	0
16 Occupancy	0	0	0	0
17 Travel	2,915	2,915	0	0
18 Payments of travel or entertainment expenses for any federal, state, or local public officials	0	0	0	0
19 Conferences, conventions, and meetings	2,486	1,186	1,300	0
20 Interest	0	0	0	0
21 Payments to affiliates	0	0	0	0
22 Depreciation, depletion, and amortization	732	0	732	0
23 Insurance	0	0	0	0
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a Donations to other nonprofit groups	1,600	1,600	0	0
b Miscellaneous expenses	2,288	0	2,288	0
c				
d				
e All other expenses				
25 Total functional expenses. Add lines 1 through 24e	374,649	355,788	18,831	30
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720)				

Part X Balance SheetCheck if Schedule O contains a response or note to any line in this Part X ☐

		(A) Beginning of year		(B) End of year	
Assets	1	Cash—non-interest-bearing	1,105	1	12,729
	2	Savings and temporary cash investments	61,292	2	70,612
	3	Pledges and grants receivable, net	20,250	3	11,000
	4	Accounts receivable, net	403	4	998
	5	Loans and other receivables from current and former officers, directors, trustees, key employees, and highest compensated employees. Complete Part II of Schedule L	0	5	0
	6	Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), persons described in section 4958(c)(3)(B), and contributing employers and sponsoring organizations of section 501(c)(9) voluntary employees' beneficiary organizations (see instructions). Complete Part II of Schedule L	0	6	0
	7	Notes and loans receivable, net	0	7	0
	8	Inventories for sale or use	0	8	0
	9	Prepaid expenses and deferred charges	0	9	0
	10a	Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	26,897		
	10b	Less: accumulated depreciation	25,912		
	11	Investments—publicly traded securities	1,717	10c	985
	12	Investments—other securities. See Part IV, line 11	1,062	11	1,976
	13	Investments—program-related. See Part IV, line 11	0	12	0
	14	Intangible assets	0	13	0
	15	Other assets. See Part IV, line 11	0	14	0
16	Total assets. Add lines 1 through 15 (must equal line 34)	85,829	15	98,300	
Liabilities	17	Accounts payable and accrued expenses	2,503	16	4,852
	18	Grants payable	0	17	0
	19	Deferred revenue	0	18	0
	20	Tax-exempt bond liabilities	0	19	0
	21	Escrow or custodial account liability. Complete Part IV of Schedule D	0	20	0
	22	Loans and other payables to current and former officers, directors, trustees, key employees, highest compensated employees, and disqualified persons. Complete Part II of Schedule L	0	21	0
	23	Secured mortgages and notes payable to unrelated third parties	0	22	0
	24	Unsecured notes and loans payable to unrelated third parties	0	23	0
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17-24). Complete Part X of Schedule D	0	24	0
	26	Total liabilities. Add lines 17 through 25	2,503	25	0
Net Assets or Fund Balances	Organizations that follow SFAS 117 (ASC 958), check here <input checked="" type="checkbox"/> and complete lines 27 through 29, and lines 33 and 34.				
	27	Unrestricted net assets	-29,515	26	4,852
	28	Temporarily restricted net assets	112,841	27	-32,791
	29	Permanently restricted net assets	0	28	126,239
	Organizations that do not follow SFAS 117 (ASC 958), check here <input type="checkbox"/> and complete lines 30 through 34.				
	30	Capital stock or trust principal, or current funds		29	0
	31	Paid-in or capital surplus, or land, building, or equipment fund		30	
	32	Retained earnings, endowment, accumulated income, or other funds		31	
	33	Total net assets or fund balances	83,326	32	
	34	Total liabilities and net assets/fund balances	85,829	33	93,448
			34	98,300	

Part XI Reconciliation of Net AssetsCheck if Schedule O contains a response or note to any line in this Part XI ☐

1	Total revenue (must equal Part VIII, column (A), line 12)	1	383,857
2	Total expenses (must equal Part IX, column (A), line 25)	2	374,649
3	Revenue less expenses. Subtract line 2 from line 1	3	9,208
4	Net assets or fund balances at beginning of year (must equal Part X, line 33, column (A))	4	83,326
5	Net unrealized gains (losses) on investments	5	914
6	Donated services and use of facilities	6	0
7	Investment expenses	7	0
8	Prior period adjustments	8	0
9	Other changes in net assets or fund balances (explain in Schedule O)	9	0
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 33, column (B))	10	93,448

Part XII Financial Statements and ReportingCheck if Schedule O contains a response or note to any line in this Part XII ☐

- 1** Accounting method used to prepare the Form 990: ☐ Cash ☒ Accrual ☐ Other _____
If the organization changed its method of accounting from a prior year or checked "Other," explain in Schedule O.
- 2a** Were the organization's financial statements compiled or reviewed by an independent accountant? . . .
If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:
☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis
- b** Were the organization's financial statements audited by an independent accountant? . . .
If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:
☐ Separate basis ☐ Consolidated basis ☐ Both consolidated and separate basis
- c** If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant? . . .
If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.
- 3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133? . . .
- b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.

	Yes	No
2a		✓
2b		✓
2c		
3a		✓
3b		

SCHEDULE A
(Form 990 or 990-EZ)

Department of the Treasury
Internal Revenue Service

Public Charity Status and Public Support

Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust.

► Attach to Form 990 or Form 990-EZ.

► Information about Schedule A (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

OMB No. 1545-0047

2016

Open to Public
Inspection

Name of the organization

Employer identification number

Essential information

52-1299631

Part I Reason for Public Charity Status (All organizations must complete this part.) See instructions.

The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1 ☐ A church, convention of churches, or association of churches described in section 170(b)(1)(A)(i).
- 2 ☐ A school described in section 170(b)(1)(A)(ii). (Attach Schedule E (Form 990 or 990-EZ).)
- 3 ☐ A hospital or a cooperative hospital service organization described in section 170(b)(1)(A)(iii).
- 4 ☐ A medical research organization operated in conjunction with a hospital described in section 170(b)(1)(A)(iii). Enter the hospital's name, city, and state: _____
- 5 ☐ An organization operated for the benefit of a college or university owned or operated by a governmental unit described in section 170(b)(1)(A)(iv). (Complete Part II.)
- 6 ☐ A federal, state, or local government or governmental unit described in section 170(b)(1)(A)(v).
- 7 ☒ An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in section 170(b)(1)(A)(vi). (Complete Part II.)
- 8 ☐ A community trust described in section 170(b)(1)(A)(vii). (Complete Part II.)
- 9 ☐ An agricultural research organization described in section 170(b)(1)(A)(ix) operated in conjunction with a land-grant college or university or a non-land-grant college of agriculture (see instructions). Enter the name, city, and state of the college or university: _____
- 10 ☐ An organization that normally receives: (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions—subject to certain exceptions, and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See section 509(a)(2). (Complete Part III.)
- 11 ☐ An organization organized and operated exclusively to test for public safety. See section 509(a)(4).
- 12 ☐ An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in section 509(a)(1) or section 509(a)(2). See section 509(a)(3). Check the box in lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
- a ☐ **Type I.** A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. You must complete Part IV, Sections A and B.
- b ☐ **Type II.** A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). You must complete Part IV, Sections A and C.
- c ☐ **Type III functionally integrated.** A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). You must complete Part IV, Sections A, D, and E.
- d ☐ **Type III non-functionally integrated.** A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). You must complete Part IV, Sections A and D, and Part V.
- e ☐ Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.
- f Enter the number of supported organizations
- g Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1–10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
(A)						
(B)						
(C)						
(D)						
(E)						
Total						

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)
(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Section A. Public Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")	292,124	603,943	355,955	267,250	381,750	1,901,022
2 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf	0	0	0	0	0	0
3 The value of services or facilities furnished by a governmental unit to the organization without charge	0	0	0	0	0	0
4 Total. Add lines 1 through 3	292,124	603,943	355,955	267,250	381,750	1,901,022
5 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f)						1,010,405
6 Public support. Subtract line 5 from line 4						890,617

Section B. Total Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
7 Amounts from line 4	292,124	603,943	355,955	267,250	381,750	1,901,022
8 Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources	31	46	17	14	58	166
9 Net income from unrelated business activities, whether or not the business is regularly carried on	0	0	0	0	0	0
10 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)	0	0	0	0	0	0
11 Total support. Add lines 7 through 10						1,901,188
12 Gross receipts from related activities, etc. (see instructions)					12	33,569
13 First five years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here						<input type="checkbox"/>

Section C. Computation of Public Support Percentage

14 Public support percentage for 2016 (line 6, column (f) divided by line 11, column (f))	14	46.84 %
15 Public support percentage from 2015 Schedule A, Part II, line 14	15	46.92 %
16a 33 1/3% support test—2016. If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization	<input checked="" type="checkbox"/>	
b 33 1/3% support test—2015. If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization	<input type="checkbox"/>	
17a 10%-facts-and-circumstances test—2016. If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here. Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization	<input type="checkbox"/>	
b 10%-facts-and-circumstances test—2015. If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here. Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization	<input type="checkbox"/>	
18 Private foundation. If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions	<input type="checkbox"/>	

Part III Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II.
If the organization fails to qualify under the tests listed below, please complete Part II.)

Section A. Public Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")						
2 Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose						
3 Gross receipts from activities that are not an unrelated trade or business under section 513						
4 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5 The value of services or facilities furnished by a governmental unit to the organization without charge						
6 Total. Add lines 1 through 5						
7a Amounts included on lines 1, 2, and 3 received from disqualified persons						
b Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year						
c Add lines 7a and 7b						
8 Public support. (Subtract line 7c from line 6.)						

Section B. Total Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
9 Amounts from line 6						
10a Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources						
b Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975						
c Add lines 10a and 10b						
11 Net income from unrelated business activities not included in line 10b, whether or not the business is regularly carried on						
12 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
13 Total support. (Add lines 9, 10c, 11, and 12.)						
14 First five years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here	<input type="checkbox"/>					

Section C. Computation of Public Support Percentage

15 Public support percentage for 2016 (line 8, column (f) divided by line 13, column (f))	15	%
16 Public support percentage from 2015 Schedule A, Part III, line 15	16	%

Section D. Computation of Investment Income Percentage

17 Investment income percentage for 2016 (line 10c, column (f) divided by line 13, column (f))	17	%
18 Investment income percentage from 2015 Schedule A, Part III, line 17	18	%

19a 33 1/3% support tests—2016. If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and stop here. The organization qualifies as a publicly supported organization ☐

b 33 1/3% support tests—2015. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3%, and line 18 is not more than 33 1/3%, check this box and stop here. The organization qualifies as a publicly supported organization ☐

20 Private foundation. If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions ☐

Part IV Supporting Organizations

(Complete only if you checked a box in line 12 on Part I. If you checked 12a of Part I, complete Sections A and B. If you checked 12b of Part I, complete Sections A and C. If you checked 12c of Part I, complete Sections A, D, and E. If you checked 12d of Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

	Yes	No
1 Are all of the organization's supported organizations listed by name in the organization's governing documents? If "No," describe in Part VI how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.		
2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in Part VI how the organization determined that the supported organization was described in section 509(a)(1) or (2).		
3a Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer (b) and (c) below.		
b Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? If "Yes," describe in Part VI when and how the organization made the determination.		
c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in Part VI what controls the organization put in place to ensure such use.		
4a Was any supported organization not organized in the United States ("foreign supported organization")? If "Yes," and if you checked 12a or 12b in Part I, answer (b) and (c) below.		
b Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in Part VI how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.		
c Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in Part VI what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.		
5a Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer (b) and (c) below (if applicable). Also, provide detail in Part VI, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).		
b Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?		
c Substitutions only. Was the substitution the result of an event beyond the organization's control?		
6 Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in Part VI.		
7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).		
8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described in line 7? If "Yes," complete Part I of Schedule L (Form 990 or 990-EZ).		
9a Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in Part VI.		
b Did one or more disqualified persons (as defined in line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in Part VI.		
c Did a disqualified person (as defined in line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in Part VI.		
10a Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer 10b below.		
b Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings.)		

Part IV Supporting Organizations (continued)**11** Has the organization accepted a gift or contribution from any of the following persons?

- a** A person who directly or indirectly controls, either alone or together with persons described in (b) and (c) below, the governing body of a supported organization?
- b** A family member of a person described in (a) above?
- c** A 35% controlled entity of a person described in (a) or (b) above? If "Yes" to a, b, or c, provide detail in Part VI.

	Yes	No
11a		
11b		
11c		

Section B. Type I Supporting Organizations

- 1** Did the directors, trustees, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the tax year? If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove directors or trustees were allocated among the supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.
- 2** Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated, supervised, or controlled the supporting organization.

	Yes	No
1		
2		

Section C. Type II Supporting Organizations

- 1** Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of each of the organization's supported organization(s)? If "No," describe in Part VI how control or management of the supporting organization was vested in the same persons that controlled or managed the supported organization(s).

	Yes	No
1		

Section D. All Type III Supporting Organizations

- 1** Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided?
- 2** Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in Part VI how the organization maintained a close and continuous working relationship with the supported organization(s).
- 3** By reason of the relationship described in (2), did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year? If "Yes," describe in Part VI the role the organization's supported organizations played in this regard.

	Yes	No
1		
2		
3		

Section E. Type III Functionally Integrated Supporting Organizations

- 1** Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions).
- a** ☐ The organization satisfied the Activities Test. Complete line 2 below.
- b** ☐ The organization is the parent of each of its supported organizations. Complete line 3 below.
- c** ☐ The organization supported a governmental entity. Describe in Part VI how you supported a government entity (see instructions).

2 Activities Test. Answer (a) and (b) below.

- a** Did substantially all of the organization's activities during the tax year directly further the exempt purposes of the supported organization(s) to which the organization was responsive? If "Yes," then in Part VI identify those supported organizations and explain how these activities directly furthered their exempt purposes, how the organization was responsive to those supported organizations, and how the organization determined that these activities constituted substantially all of its activities.
- b** Did the activities described in (a) constitute activities that, but for the organization's involvement, one or more of the organization's supported organization(s) would have been engaged in? If "Yes," explain in Part VI the reasons for the organization's position that its supported organization(s) would have engaged in these activities but for the organization's involvement.
- 3** Parent of Supported Organizations. Answer (a) and (b) below.
- a** Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? Provide details in Part VI.
- b** Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each of its supported organizations? If "Yes," describe in Part VI the role played by the organization in this regard.

	Yes	No
2a		
2b		
3a		
3b		

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations

- 1 ☐ Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (explain in Part VI). See instructions. All other Type III non-functionally integrated supporting organizations must complete Sections A through E.

Section A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1 Net short-term capital gain	1		
2 Recoveries of prior-year distributions	2		
3 Other gross income (see instructions)	3		
4 Add lines 1 through 3.	4		
5 Depreciation and depletion	5		
6 Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions)	6		
7 Other expenses (see instructions)	7		
8 Adjusted Net Income (subtract lines 5, 6, and 7 from line 4).	8		
Section B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1 Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):			
a Average monthly value of securities	1a		
b Average monthly cash balances	1b		
c Fair market value of other non-exempt-use assets	1c		
d Total (add lines 1a, 1b, and 1c)	1d		
e Discount claimed for blockage or other factors (explain in detail in Part VI):			
2 Acquisition indebtedness applicable to non-exempt-use assets	2		
3 Subtract line 2 from line 1d.	3		
4 Cash deemed held for exempt use. Enter 1-1/2% of line 3 (for greater amount, see instructions).	4		
5 Net value of non-exempt-use assets (subtract line 4 from line 3)	5		
6 Multiply line 5 by .035.	6		
7 Recoveries of prior-year distributions	7		
8 Minimum Asset Amount (add line 7 to line 6)	8		
Section C - Distributable Amount			Current Year
1 Adjusted net income for prior year (from Section A, line 8, Column A)	1		
2 Enter 85% of line 1.	2		
3 Minimum asset amount for prior year (from Section B, line 8, Column A)	3		
4 Enter greater of line 2 or line 3.	4		
5 Income tax imposed in prior year	5		
6 Distributable Amount. Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions).	6		
7 <input type="checkbox"/> Check here if the current year is the organization's first as a non-functionally integrated Type III supporting organization (see instructions).			

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued)

Section D - Distributions		Current Year	
1	Amounts paid to supported organizations to accomplish exempt purposes		
2	Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity		
3	Administrative expenses paid to accomplish exempt purposes of supported organizations		
4	Amounts paid to acquire exempt-use assets		
5	Qualified set-aside amounts (prior IRS approval required)		
6	Other distributions (describe in Part VI). See instructions.		
7	Total annual distributions. Add lines 1 through 6.		
8	Distributions to attentive supported organizations to which the organization is responsive (provide details in Part VI). See instructions.		
9	Distributable amount for 2016 from Section C, line 6		
10	Line 8 amount divided by Line 9 amount		

Section E - Distribution Allocations (see instructions)	(i) Excess Distributions	(ii) Underdistributions Pre-2016	(iii) Distributable Amount for 2016
1 Distributable amount for 2016 from Section C, line 6			
2 Underdistributions, if any, for years prior to 2016 (reasonable cause required—explain in Part VI). See instructions.			
3 Excess distributions carryover, if any, to 2016:			
a			
b			
c From 2013			
d From 2014			
e From 2015			
f Total of lines 3a through e			
g Applied to underdistributions of prior years			
h Applied to 2016 distributable amount			
i Carryover from 2011 not applied (see instructions)			
j Remainder. Subtract lines 3g, 3h, and 3i from 3f.			
4 Distributions for 2016 from Section D, line 7: \$			
a Applied to underdistributions of prior years			
b Applied to 2016 distributable amount			
c Remainder. Subtract lines 4a and 4b from 4.			
5 Remaining underdistributions for years prior to 2016, if any. Subtract lines 3g and 4a from line 2. For result greater than zero, explain in Part VI. See instructions.			
6 Remaining underdistributions for 2016. Subtract lines 3h and 4b from line 1. For result greater than zero, explain in Part VI. See instructions.			
7 Excess distributions carryover to 2017. Add lines 3j and 4c.			
8 Breakdown of line 7:			
a			
b Excess from 2013			
c Excess from 2014			
d Excess from 2015			
e Excess from 2016			

Part VI

Supplemental Information. Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a, and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)

SCHEDULE C
(Form 990 or 990-EZ)

Political Campaign and Lobbying Activities

OMB No. 1545-0047

2016

**Open to Public
Inspection**

Department of the Treasury
Internal Revenue Service

For Organizations Exempt From Income Tax Under section 501(c) and section 527

- ▶ **Complete if the organization is described below.** ▶ **Attach to Form 990 or Form 990-EZ.**
▶ **Information about Schedule C (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.**

If the organization answered "Yes," on Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- **Section 501(c)(3) organizations:** Complete Parts I-A and B. Do not complete Part I-C.
- **Section 501(c) (other than section 501(c)(3)) organizations:** Complete Parts I-A and C below. Do not complete Part I-B.
- **Section 527 organizations:** Complete Part I-A only.

If the organization answered "Yes," on Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- **Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)):** Complete Part II-A. Do not complete Part II-B.
- **Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)):** Complete Part II-B. Do not complete Part II-A.

If the organization answered "Yes," on Form 990, Part IV, line 5 (Proxy Tax) (see separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (see separate instructions), then

- **Section 501(c)(4), (5), or (6) organizations:** Complete Part III.

Name of organization	Employer identification number
	52-1299631

Essential Information

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV. (see instructions for definition of "political campaign activities")
- 2 Political campaign activity expenditures (see instructions) ▶ \$
- 3 Volunteer hours for political campaign activities (see instructions)

Part I-B Complete if the organization is exempt under section 501(c)(3).

- 1 Enter the amount of any excise tax incurred by the organization under section 4955 ▶ \$
- 2 Enter the amount of any excise tax incurred by organization managers under section 4955 ▶ \$
- 3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? ☐ Yes ☐ No
- 4a Was a correction made? ☐ Yes ☐ No
- b If "Yes," describe in Part IV.

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities ▶ \$
- 2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities ▶ \$
- 3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b ▶ \$
- 4 Did the filing organization file Form 1120-POL for this year? ☐ Yes ☐ No
- 5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

(a) Name	(b) Address	(c) EIN	(d) Amount paid from filing organization's funds. If none, enter -0-.	(e) Amount of political contributions received and promptly and directly delivered to a separate political organization. If none, enter -0-.
(1)				
(2)				
(3)				
(4)				
(5)				
(6)				

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

A Check ☐ if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).

B Check ☐ if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)		(a) Filing organization's totals	(b) Affiliated group totals												
1a	Total lobbying expenditures to influence public opinion (grass roots lobbying)	0													
b	Total lobbying expenditures to influence a legislative body (direct lobbying)	0													
c	Total lobbying expenditures (add lines 1a and 1b)	0													
d	Other exempt purpose expenditures	0													
e	Total exempt purpose expenditures (add lines 1c and 1d)	0													
f	Lobbying nontaxable amount. Enter the amount from the following table in both columns.	0													
<table border="1"> <thead> <tr> <th>If the amount on line 1e, column (a) or (b) is:</th> <th>The lobbying nontaxable amount is:</th> </tr> </thead> <tbody> <tr> <td>Not over \$500,000</td> <td>20% of the amount on line 1e.</td> </tr> <tr> <td>Over \$500,000 but not over \$1,000,000</td> <td>\$100,000 plus 15% of the excess over \$500,000.</td> </tr> <tr> <td>Over \$1,000,000 but not over \$1,500,000</td> <td>\$175,000 plus 10% of the excess over \$1,000,000.</td> </tr> <tr> <td>Over \$1,500,000 but not over \$17,000,000</td> <td>\$225,000 plus 5% of the excess over \$1,500,000.</td> </tr> <tr> <td>Over \$17,000,000</td> <td>\$1,000,000.</td> </tr> </tbody> </table>		If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:	Not over \$500,000	20% of the amount on line 1e.	Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.	Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.	Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.	Over \$17,000,000	\$1,000,000.		
If the amount on line 1e, column (a) or (b) is:	The lobbying nontaxable amount is:														
Not over \$500,000	20% of the amount on line 1e.														
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000.														
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000.														
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000.														
Over \$17,000,000	\$1,000,000.														
g	Grassroots nontaxable amount (enter 25% of line 1f)	0													
h	Subtract line 1g from line 1a. If zero or less, enter -0-	0													
i	Subtract line 1f from line 1c. If zero or less, enter -0-	0													
j	If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?		<input type="checkbox"/> Yes <input type="checkbox"/> No												

4-Year Averaging Period Under section 501(h)

(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 2013	(b) 2014	(c) 2015	(d) 2016	(e) Total
2a Lobbying nontaxable amount	0	0	0	0	0
b Lobbying ceiling amount (150% of line 2a, column (e))					0
c Total lobbying expenditures	0	0	0	0	0
d Grassroots nontaxable amount	0	0	0	0	0
e Grassroots ceiling amount (150% of line 2d, column (e))					0
f Grassroots lobbying expenditures	0	0	0	0	0

Part II-B Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768 (election under section 501(h)).

For each "Yes," response on lines 1a through 1i below, provide in Part IV a detailed description of the lobbying activity.

	(a)		(b)
	Yes	No	Amount
1 During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a Volunteers?			
b Paid staff or management (include compensation in expenses reported on lines 1c through 1i)?			
c Media advertisements?			
d Mailings to members, legislators, or the public?			
e Publications, or published or broadcast statements?			
f Grants to other organizations for lobbying purposes?			
g Direct contact with legislators, their staffs, government officials, or a legislative body?			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?			
i Other activities?			
j Total. Add lines 1c through 1i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If "Yes," enter the amount of any tax incurred under section 4912			
c If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?	1	
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?	2	
3 Did the organization agree to carry over lobbying and political campaign activity expenditures from the prior year?	3	

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No," OR (b) Part III-A, line 3, is answered "Yes."

1 Dues, assessments and similar amounts from members	1	
2 Section 162(e) nondeductible lobbying and political expenditures (do not include amounts of political expenses for which the section 527(f) tax was paid).		
a Current year	2a	
b Carryover from last year	2b	
c Total	2c	
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues	3	
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of the excess does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	4	
5 Taxable amount of lobbying and political expenditures (see instructions)	5	

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (see instructions); and Part II-B, line 1. Also, complete this part for any additional information.

SCHEDULE D
(Form 990)

Department of the Treasury
Internal Revenue Service

Supplemental Financial Statements

► Complete if the organization answered "Yes" on Form 990,
Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.
► Attach to Form 990.

► Information about Schedule D (Form 990) and its instructions is at www.irs.gov/form990.

OMB No. 1545-0047

2016

Open to Public
Inspection

Name of the organization

Employer identification number

Essential Information

52-1299631

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.

Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

	(a) Donor advised funds	(b) Funds and other accounts
1 Total number at end of year		
2 Aggregate value of contributions to (during year)		
3 Aggregate value of grants from (during year)		
4 Aggregate value at end of year		
5 Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6 Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit?		<input type="checkbox"/> Yes <input type="checkbox"/> No

Part II Conservation Easements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

1 Purpose(s) of conservation easements held by the organization (check all that apply).
☐ Preservation of land for public use (e.g., recreation or education) ☐ Preservation of a historically important land area
☐ Protection of natural habitat ☐ Preservation of a certified historic structure
☐ Preservation of open space

2 Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.

	Held at the End of the Tax Year
a Total number of conservation easements	2a
b Total acreage restricted by conservation easements	2b
c Number of conservation easements on a certified historic structure included in (a)	2c
d Number of conservation easements included in (c) acquired after 8/17/06, and not on a historic structure listed in the National Register	2d

3 Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ►

4 Number of states where property subject to conservation easement is located ►

5 Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds? ☐ Yes ☐ No

6 Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ►

7 Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ► \$

8 Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)? ☐ Yes ☐ No

9 In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

1a If the organization elected, as permitted under SFAS 116 (ASC 958), not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIII, the text of the footnote to its financial statements that describes these items.

b If the organization elected, as permitted under SFAS 116 (ASC 958), to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items:

(i) Revenue included on Form 990, Part VIII, line 1 ► \$

(ii) Assets included in Form 990, Part X ► \$

2 If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under SFAS 116 (ASC 958) relating to these items:

a Revenue included on Form 990, Part VIII, line 1 ► \$

b Assets included in Form 990, Part X ► \$

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

3 Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply):

- a ☐ Public exhibition
b ☐ Scholarly research

- d ☐ Loan or exchange programs
e ☐ Other _____

c ☐ Preservation for future generations

4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.

5 During the year, did the organization solicit or receive donations of art, historical treasures, or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? ☐ Yes ☐ No

Part IV Escrow and Custodial Arrangements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? ☐ Yes ☐ No

b If "Yes," explain the arrangement in Part XIII and complete the following table:

	Amount
c Beginning balance	1c
d Additions during the year	1d
e Distributions during the year	1e
f Ending balance	1f

2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? ☐ Yes ☐ No

b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided on Part XIII ☐

Part V Endowment Funds.

Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
1a Beginning of year balance					
b Contributions					
c Net investment earnings, gains, and losses					
d Grants or scholarships					
e Other expenditures for facilities and programs					
f Administrative expenses					
g End of year balance					

2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:

- a Board designated or quasi-endowment %
b Permanent endowment %
c Temporarily restricted endowment %

The percentages on lines 2a, 2b, and 2c should equal 100%.

3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:

- (i) unrelated organizations
(ii) related organizations

	Yes	No
3a(i)		
3a(ii)		
3b		

b If "Yes" on line 3a(ii), are the related organizations listed as required on Schedule R? ☐

4 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value
1a Land	0	0	0	0
b Buildings	0	0	0	0
c Leasehold improvements	0	0	0	0
d Equipment	0	26,897	25,912	985
e Other	0	0	0	0
Total. Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10c.)				985

Part VII Investments—Other Securities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives		
(2) Closely-held equity interests		
(3) Other _____		
(A) _____		
(B) _____		
(C) _____		
(D) _____		
(E) _____		
(F) _____		
(G) _____		
(H) _____		
Total. (Column (b) must equal Form 990, Part X, col. (B) line 12.) ►		

Part VIII Investments—Program Related.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) _____		
(2) _____		
(3) _____		
(4) _____		
(5) _____		
(6) _____		
(7) _____		
(8) _____		
(9) _____		
Total. (Column (b) must equal Form 990, Part X, col. (B) line 13.) ►		

Part IX Other Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

(a) Description	(b) Book value
(1) _____	
(2) _____	
(3) _____	
(4) _____	
(5) _____	
(6) _____	
(7) _____	
(8) _____	
(9) _____	
Total. (Column (b) must equal Form 990, Part X, col. (B) line 15.) ►	

Part X Other Liabilities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	
(2) _____	
(3) _____	
(4) _____	
(5) _____	
(6) _____	
(7) _____	
(8) _____	
(9) _____	
Total. (Column (b) must equal Form 990, Part X, col. (B) line 25.) ►	

2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FIN 48 (ASC 740). Check here if the text of the footnote has been provided in Part XIII ☐

Part XI		Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.	
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Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements		1	
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
a	Net unrealized gains (losses) on investments	2a		
b	Donated services and use of facilities	2b		
c	Recoveries of prior year grants	2c		
d	Other (Describe in Part XIII.)	2d		
e	Add lines 2a through 2d		2e	
3	Subtract line 2e from line 1		3	
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a		
b	Other (Describe in Part XIII.)	4b		
c	Add lines 4a and 4b		4c	
5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)		5	

Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

1	Total expenses and losses per audited financial statements		1
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:		
a	Donated services and use of facilities	2a	
b	Prior year adjustments	2b	
c	Other losses	2c	
d	Other (Describe in Part XIII.)	2d	
e	Add lines 2a through 2d		2e
3	Subtract line 2e from line 1		3
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:		
a	Investment expenses not included on Form 990, Part VIII, line 7b	4a	
b	Other (Describe in Part XIII.)	4b	
c	Add lines 4a and 4b		4c
5	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)		5

Part XIII Supplemental Information.

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

[illegible]

SCHEDULE I
(Form 990)

Grants and Other Assistance to Organizations,
Governments, and Individuals in the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 21 or 22.

► Attach to Form 990.
► Information about Schedule I (Form 990) and its instructions is at www.irs.gov/form990.

OMB No. 1545-0047

2016

Open to Public
Inspection

Department of the Treasury
Internal Revenue Service

Name of the organization

Employer identification number

52-1298631

Essential Information

Part I General Information on Grants and Assistance

1 Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? ☒ Yes ☐ No

2 Describe in Part IV the organization's procedures for monitoring the use of grant funds in the United States.

Part II Grants and Other Assistance to Domestic Organizations and Domestic Governments. Complete if the organization answered "Yes" on Form 990, Part IV, line 21, for any recipient that received more than \$5,000. Part II can be duplicated if additional space is needed.

1 (a) Name and address of organization or government	(b) EIN	(c) IRC section (if applicable)	(d) Amount of cash grant	(e) Amount of non-cash assistance	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash assistance	(h) Purpose of grant or assistance
(1) Sch I, Smt 1							
(2)							
(3)							
(4)							
(5)							
(6)							
(7)							
(8)							
(9)							
(10)							
(11)							
(12)							

2 Enter total number of section 501(c)(3) and government organizations listed in the line 1 table 1

3 Enter total number of other organizations listed in the line 1 table 0

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Cat. No. 50055P

Schedule I (Form 990) (2016)

Part III Grants and Other Assistance to Domestic Individuals. Complete if the organization answered "Yes" on Form 990, Part IV, line 22.
Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non-cash assistance	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of non-cash assistance
1					
2					
3					
4					
5					
6					
7					

Part IV Supplemental Information. Provide the information required in Part I, line 2; Part III, column (b); and any other additional information.

Schedule I, Part I, Line 2 - In pursuing our organizational mission, we take all reasonable measures to abide by all laws and regulations applicable to tax-exempt organizations and to ensure grants made by the Board of Directors are used in an efficient and effective manner. Prior to making a grant, the President will review the activities of a proposed grantee organization and its programs and assess the organization's capacity to undertake the work for which the proposed grant is being made. The President or staff will also conduct a review to ensure that the proposed grantee is in compliance with any applicable U.S. Anti-Terrorism Financing Rules.

Description of Grants and Other Assistance to Governments and Organizations in the United States

		Recipient EIN	Amt. of cash grant	Amt. of non- cash asst.
Name and address	Free Africa Foundation 910 17th Street NW Suite 419 Washington, DC 20006	52-1849803	25,000	0
IRC code section	501(c)(3)			
Method of valuation	book value			
Desc. of Non-Cash Asst.				
Purpose of grant	General support grant to further the Free Africa Foundation's education work.			

SCHEDULE O
(Form 990 or 990-EZ)

Department of the Treasury
Internal Revenue Service

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on
Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

OMB No. 1545-0047

2016

Open to Public
Inspection

Name of the organization

Employer identification number

Essential information

52-1298631

Form 990, Part VI, Section B, Line 11b - Form 990 was reviewed by the President and provided to Board Members.

Form 990, Part VI, Section B, Line 12c - Essential Information circulates the conflict of interest form to staff and board, annually.

Form 990, Part VI, Section B, Line 15 - The President reviews and approves the compensation of all employees to ensure that it is reasonable. Comparable market data is used from nonprofits in this geographic area.

Form 990, Part VI, Section C, Line 19 - Essential Information (EI) provides comprehensive and timely information to the public, the media, contributors and government agencies. All solicitation materials accurately represent EI's policies, practices and programs. All financial, organizational and program reports are complete and accurate. All information about EI policies, shall be made available, upon request, in a timely manner and without charge to individuals who request it.

Form 990, Part IX, Line 11g - Newswire Services \$3,015; Website Technician \$3,594; Administrative support \$5,183; and Program Service Contractors \$237,389.

Reasonable Cause Explanations

Explanation

Essential Information filed an extension and received approval to file at a later date.